

1 WILLIAM BLUMENTHAL
General Counsel
2 JANICE L. CHARTER Colo. Bar No. 12750
3 DAVID M. NEWMAN Cal. Bar No. 54218
THOMAS DAHDOUH N.Y. Bar No. 2222370
4 Federal Trade Commission
901 Market Street, Suite 570
5 San Francisco, CA 94103
Phone (415) 848-5100/ Fax (415) 848-5184
6 jcharter@ftc.gov; dnewman@ftc.gov; tdahdouh@ftc.gov

7 ATTORNEYS FOR PLAINTIFF
FEDERAL TRADE COMMISSION
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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

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12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.
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NEXTCLICKMEDIA, LLC, *et al.*,

16 Defendants.
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Case No. C08-1718-VRW

STIPULATION FOR ORDER
EXTENDING DEADLINE FOR FILING
RESPONSIVE PLEADINGS AND
~~PROPOSED~~ ORDER

20 WHEREAS, Defendants NextClickMedia, LLC's, Next Internet, LLC's, Kenneth
21 Chan's and Albert Chen's (collectively, "Defendants") response to Plaintiff Federal Trade
22 Commission's (the "FTC") Complaint is currently due on Monday, February 2, 2009;

23 WHEREAS, the parties to this action have continued to exchange information and
24 proposed settlement provisions with the intention of exploring the possibility of settlement of
25 this matter;

26 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses
27 to Plaintiff's Complaint in order to focus on settlement discussions; and

28 WHEREAS the parties have scheduled a multi-day negotiating session for the first week

1 in February in an attempt to finalize an agreement;

2 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and
3 Defendants, through their respective counsel, that Defendants' time to move, answer or
4 otherwise respond to the Complaint shall be and hereby is extended to and including May 4,
5 2009; and

6 IT IS FURTHER STIPULATED that the Case Management Conference, currently
7 scheduled for March 26, 2009, at 3:30 p.m., be rescheduled to June 25, 2009, at 3:30 p.m., and
8 that the date for filing the Case Management Statement be extended to June 15, 2009.

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10 Dated: 1/27/09

/s/

MICHAEL C. LYNCH
KELLEY DRYE & WARREN LLP
ATTORNEY FOR DEFENDANTS

11 Dated: 1/27/09

/s/

JANICE L. CHARTER
DAVID M. NEWMAN
THOMAS N. DAHDOUH
ATTORNEYS FOR PLAINTIFF

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ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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Dated: 1/30/2009



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